Sub-Element 5.a— Activation of the Prompt Alert and Notification System

What the Policy Says

Intent

NUREG-0654 provides that OROs should have the capability to provide prompt instructions to the public within the plume pathway EPZ. Specific provisions addressed in this sub-element are derived from the Nuclear Regulatory Commission (NRC) regulations (10 CFR Part 50, Appendix E.IV.D.), and FEMA-REP-10, ``Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants."

Minimum Frequency

Criterion 5.a.1 is to be evaluated every exercise. Criterion 5.a.3 is to be evaluated every exercise as needed.

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP guidance. (10 CFR part 50, appendix E.IV.D and NUREG-0654, E.5, 6, 7).

Extent of Play

Responsible Offsite Response Organizations (ORO) should demonstrate the capability to sequentially provide an alert signal followed by an initial instructional message to populated areas (permanent resident and transient) throughout the 10-mile plume pathway EPZ. Following the decision to activate the alert and notification system, in accordance with the ORO's plan and/or procedures, completion of system activation should be accomplished in a timely manner (will not be subject to specific time requirements) for primary alerting/notification. The initial message should include the elements required by current FEMA REP guidance.

Offsite Response Organizations (ORO) with route alerting as the primary method of alerting and notifying the public should demonstrate the capability to accomplish the primary route alerting, following the decision to activate the alert and notification system, in a timely manner (will not be subject to specific time requirements) in accordance with the ORO's plan and/or procedures. At least one route needs to be demonstrated and evaluated. The selected route(s) should vary from exercise to exercise. However, the most difficult route should be demonstrated at least once every six years. All alert and notification activities along the route should be simulated (that is, the message that would actually be used is read for the evaluator, but not actually broadcast) as agreed upon in the extent of play. Actual testing of the mobile public address system will be conducted at some agreed upon location. The initial message should include the elements required by current FEMA REP guidance.

For exercise purposes, timely is defined as ``the responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay." If message dissemination is to be identified as not having been accomplished in a timely manner, the evaluator(s) will document a specific delay or cause as to why a message was not considered timely.

Procedures to broadcast the message should be fully demonstrated as they would in an actual emergency up to the point of transmission. Broadcast of the message(s) or test messages is not required. The alert signal activation may be simulated. However, the procedures should be demonstrated up to the point of actual activation.

The capability of the primary notification system to broadcast an instructional message on a 24-hour basis should be verified during an interview with appropriate personnel from the primary notification system.

All activities for this criterion must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, except as noted above or otherwise indicated in the extent of play agreement.

Preparing to Evaluate This Criterion

Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:

- What alert methods are indicated in the plans?
 - Siren system,
 - > Tone-alert radios,
 - > Primary route alerting,
 - > Telephone calls to institutions, and/or
 - Telecommunication devices for the deaf (TDD/TTY)
- Who has responsibility for activating the alert and notification system?
- Where is the decision made to activate the alert and notification system?
- Where are sirens or other alerting devices activated? What are the procedures in the event of a siren or other alerting device failure?
- Who generates and obtains approvals for the initial EAS or other notification method message?
- Where is the initial EAS or other notification method message broadcast?
- Is there verification between the ORO and the broadcast station of the EAS message prior to broadcast?
- How does the ORO verify that the EAS station received the message?
- Who develops and distributes/broadcasts follow-on emergency instructions?
- What are the procedures to ensure that messages can be broadcast 24hours per day?
- If partially automated, what does the plan indicate?

Preparing to Evaluate This Criterion (Continued)

- What notification methods are indicated in the plans?
 - > EAS or other notification method station,
 - Direct broadcast to EAS station or other notification method,
 - > Siren with public address system,
 - NOAA¹ weather radio,
 - > Tone-alert radios,
 - Primary Route notification,
 - > Telephone calls to institutions, and/or
 - > Telecommunication devices for the deaf (TDD/TTY)
- For primary route alerting and notification, how long are the routes?
- Does the plan have pre-scripted EAS or other notification method messages?
- Does the plan contain pre-scripted follow-on messages or news releases?
- Do the pre-scripted messages contain all FEMA requirements?

During the Exercise

During the exercise, in addition to evaluating activities related to the items listed above, be sure to:

[At ORO: Sequence is = Alert then Notification]

- Note time of Alert Signal (can be simulated).
 - > Method used: sirens, tone alert radios, other
- Note time of instructional message.
 - > Method used: EAS station, National Weather Service, other
- Observe whether message contents were clear and accurate? Did they correctly reflect the PADs? (Obtain copies.)
- Note if the message was pre-scripted. If so, did it contain all the required FEMA guidance?
- Identify the ORO that authorized the A & N sequence.
- Note if the ORO issued follow-on news releases/special news broadcasts after activation of the EAS or other notification method. (Obtain copies of the messages.)
- Observe whether the EAS station or other notification method was kept updated by the ORO about which messages to continue broadcasting, and at what time intervals.
- Document any delays or reasons why message(s) were not timely.

At EAS Station:

- Observe whether EAS station staff demonstrate the procedures to broadcast messages.
- Note whether the EAS station verifies, if required, that the message was from ORO, and that it is the correct message?
- Note time(s) of all messages.
- Note if the EAS station was kept updated with new information and messages.
- Interview personnel to determine 24-hour capability.

Criterion 5.a.2: [Reserved]

¹ NOAA=National Oceanic and Atmospheric Administration

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Criterion 5.a.3: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. Backup alert and notification of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system. (NUREG-0654, E.6, Appendix 3.B.2.c).

Extent of Play

Offsite Response Organizations (ORO) with FEMA-approved exception areas (identified in the approved Alert and Notification System Design Report) 5-10 miles from the nuclear power plant should demonstrate the capability to accomplish primary alerting and notification of the exception area(s) within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The 45-minute clock will begin when the OROs make the decision to activate the alert and notification system for the first time for a specific emergency situation. The initial message should, at a minimum, include: a statement that an emergency exists at the plant and where to obtain additional information.

For exception area alerting, at least one route needs to be demonstrated and evaluated. The selected route(s) should vary from exercise to exercise. However, the most difficult route should be demonstrated at least once every six years. All alert and notification activities along the route should be simulated (that is, the message that would actually be used is read for the evaluator, but not actually broadcast) as agreed upon in the extent of play. Actual testing of the mobile public address system will be conducted at some agreed-upon location.

Backup alert and notification of the public should be completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system. Backup route alerting only needs to be demonstrated and evaluated, in accordance with the ORO's plan and/or procedures and the extent of play agreement, if the exercise scenario calls for failure of any portion of the primary system(s), or if any portion of the primary system(s) actually fails to function. If demonstrated, only one route needs to be selected and demonstrated. All alert and notification activities along the route should be simulated (that is, the message that would actually be used is read for the evaluator, but not actually broadcast) as agreed upon in the extent of play. Actual testing of the mobile public address system will be conducted at some agreed-upon location.

All activities for this criterion must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, except as noted above or otherwise indicated in the extent of play agreement.

Preparing to Evaluate This Criterion

Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:

- Does this location have any FEMA approved exception areas where alert and notification must be completed within 45 minutes?
- How many approved exception routes are there?
- What message would be delivered while on the route?
- How would that message be delivered?
 - Voice,
 - Public address system, and/or
 - > Flyers.
- Is there a plan for back up route alerting if there is siren failure?
- What are the resources for providing backup route alerting?
- Who notifies the resources to begin backup route alerting?
- How are the resources notified?
- What message would be provided to the public?

During the Exercise

During the exercise, in addition to evaluating activities related to the items listed above, be sure to:

- Document whether notification of exception areas was completed within 45 minutes following initial decision.
- Note if a route (or routes) was actually demonstrated (or simulated if inclement weather).
- Note the length of time it took to run the route, if it was actually demonstrated.
- Check to see if the message contents included elements required by current FEMA REP guidance (obtain copy of message). Note that actual message should be read to evaluator – but not broadcast.
- Note if the public address system was tested at an agreed upon location.
- Document any delays or cause why message not considered timely.

For Backup Alert and Notification: (per plans and extent of play agreement)

- Note whether backup alert and notification was completed within 45 minutes after detection that primary alert and notification system failed?
- Document whether a route (or routes) was actually demonstrated?
 (Check extent of play agreement)
- Check the message contents to be sure that it included elements required by current FEMA REP guidance. Note that the actual message should be read to evaluator but not broadcast.
- Note if the public address system was tested at an agreed upon location.
- Document any delays or cause why message not considered timely.

Sub-Element 5.b— Emergency Information and Instructions for the Public and Media

What the Policy Says

Intent

NUREG-0654 provides that OROs should have the capability to disseminate to the public appropriate emergency information and instructions, including any recommended protective actions. In addition, NUREG-0654 provides that OROs should ensure that the capability exists for providing information to the media. This includes the availability of a physical location for use by the media during an emergency. NUREG-0654 also provides that a system should be available for dealing with rumors. This system will hereafter be known as the public inquiry hotline.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner. (NUREG-0654, E. 5, 7; G.3.a, G.4.c).

Minimum Frequency

Criterion 5.b.1 is to be evaluated every exercise.

Extent of Play

Subsequent emergency information and instructions should be provided to the public and the media in a timely manner (will not be subject to specific time requirements). For exercise purposes, timely is defined as "the responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay." If message dissemination is to be identified as not having been accomplished in a timely manner, the evaluator(s) will document a specific delay or cause as to why a message was not considered timely.

The ORO should ensure that emergency information and instructions are consistent with protective action decisions made by appropriate officials. The emergency information should contain all necessary and applicable instructions (for example, evacuation instructions, evacuation routes, reception center locations, what to take when evacuating, information concerning pets, shelter-in-place instructions, information concerning protective actions for schools and special populations, public inquiry telephone number, etc.) to assist the public in carrying out protective action decisions provided to them. The ORO should also be prepared to disclose and explain the Emergency Classification Level (ECL) of the incident. At a minimum, this information must be included in media briefings and/or media releases. OROs should demonstrate the capability to use language that is clear and understandable to the public within both the plume and ingestion pathway EPZs. This includes demonstration of the capability to use familiar landmarks and boundaries to describe protective action areas.

The emergency information should be all-inclusive by including previously identified protective action areas that are still valid, as well as new areas. The OROs should demonstrate the capability to ensure that emergency information that is no longer valid is rescinded and not repeated by broadcast media. In addition, the OROs should demonstrate the capability to ensure that current emergency information is repeated at pre-established intervals in accordance with the plan and/or procedures.

OROs should demonstrate the capability to develop emergency information in a non-English language when required by the plan and/or procedures.

If ingestion pathway measures are exercised, OROs should demonstrate that a system exists for rapid dissemination of ingestion pathway information to pre-determined individuals and businesses in accordance with the ORO's plan and/or procedures.

OROs should demonstrate the capability to provide timely, accurate, concise, and coordinated information to the news media for subsequent dissemination to the public. This would include demonstration of the capability to conduct timely and pertinent media briefings and distribute media releases as the situation warrants. The OROs should demonstrate the capability to respond appropriately to inquiries from the news media. All information presented in media briefings and media releases should be consistent with protective action decisions and other emergency information provided to the public. Copies of pertinent emergency information (for example, EAS messages and media releases) and media information kits should be available for dissemination to the media.

OROs should demonstrate that an effective system is in place for dealing with calls to the public inquiry hotline. Hotline staff should demonstrate the capability to provide or obtain accurate information for callers or refer them to an appropriate information source. Information from the hotline staff, including information that corrects false or inaccurate information when trends are noted, should be included, as appropriate, in emergency information provided to the public, media briefings, and/or media releases.

All activities for this criterion must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.

Preparing to Evaluate This Criterion

Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:

- What facility is designated as the media center? Can news be disseminated from other locations?
- How are subsequent EAS message and "Special New Broadcasts" handled?
- Who is designated as the spokesperson(s) for the facility? Do local governments send representatives to the facility?
- How are messages coordinated with all appropriate staff, organizations, and OROs?
- Are there pre-scripted messages in the plan or procedures?
- Who is responsible for the Public Inquiry hotline? Where is the hotline located?
- What are the approved sources of information that are available to the hotline staff?
- Is public information required to be available in non-English languages at this location/site?

During the Exercise

During the exercise, in addition to evaluating activities related to the items listed above, be sure to:

- Document whether emergency information and instructions:
 - Were consistent with protective action decisions made by appropriate officials,
 - Were current (invalid or outdated information deleted),
 - Were complete, containing all necessary and applicable instructions for public,
 - Contained evacuation instructions including evacuation routes,
 - Indicated Reception Center locations,
 - Included information on what to take when evacuating,
 - > Included information on pets,
 - > Described shelter-in-place information (if applicable),
 - Contained information on schools and special populations,
 - Listed a public information or inquiry telephone number
 - Referenced Public Information Brochures and other printed sources of emergency information (such as telephone books),
 - Described routes and locations using familiar landmarks and road names.
- Document media briefings: Number, times, content of briefings, and whether information disseminated was accurate.
- Document press releases: Number, times, copies of releases, and accuracy of information. Observe whether copies of news releases and EAS or other notification method messages were retained and provided to media? (Obtain copies and copy of media log and, if there is one, a copy of the media kit.)
- Note that incoming and outgoing messages and media releases were logged. (Obtain a copy of the log.)
- Note whether the ORO updated the media and the EAS station(s) or other notification method as information developed.
- Note whether information is repeated at pre-established intervals. If so, how often was information repeated?

During the Exercise (Continued)

- Compare EAS or other notification method, Special News Broadcasts messages, press releases, media briefings, and media inquiries for consistency and accuracy.
- Observe if the media spokesperson (i.e., the Public Information Officer (PIO)) handled media inquiries and telephone inquiries.
- Note whether media broadcasts were monitored.
- Determine whether emergency information was disseminated in a non-English language, if required.
- For Post Plume Phase -
 - > Document whether there was rapid dissemination of ingestion pathway information to pre-determined individuals and businesses?

Public Inquiry Function:

- Document whether Public Inquiry staff:
 - Obtained accurate information for callers,
 - > Referred callers to appropriate information source(s),
 - Coordinated with the Public Information Officer,
 - Provided the PIO with information on trends or false rumors.
- Verify that trends and/or rumors are addressed in media releases.
- Note whether the Public Inquiry staff monitored media broadcasts.